

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

JOHN SCATCHELL,

Plaintiff,

v.

VILLAGE OF MELROSE PARK, *et al.*,

Defendants.

Case Number 2018-cv-03989

The Honorable John F. Kness

Magistrate Judge Michael Mason

JOINT STATUS REPORT REPORT

Pursuant to Magistrate Judge Cummings' June 11, 2020 Order [Dkt. # 62], the Parties, jointly, through their respective counsels, state as follows:

1. What Discovery (both fact and expert) Remaining

A. Fact Discovery

Plaintiff seeks to take the depositions of two current VMP PD officers, a private individual, and the 30(b)(6) deposition of the Village based upon twelve identified topics. The Defendants seek to take the deposition of one other officer, and the deposition of Plaintiff's son, who appears prominently in the Second Amended Complaint. The Parties are planning to schedule the foregoing depositions after July 20, 2020, and before the August 14, 2020 discovery cutoff, but cannot finalize the dates until the 30(b)(6) topics are finalized. Plaintiff may be tendering additional Rule 33, 34 and 36 Requests before the close of fact discovery.

B. Expert Discovery

Plaintiff has identified expert discovery relative to phone records produced in discovery. Defendants have not initiated or identified Expert Discovery.

2. Whether the Parties Have Fully Resolved Their Prior Dispute Surrounding Plaintiff's Rule 30(b)(6) Notice and, if they have not, Provide a Statement Regarding the Parties' Respective Positions on the Issue.

The Parties have not fully resolved the issue. On June 12, 2020, the Village submitted its Responses Regarding Plaintiff's Deposition Exhibit List, and on June 29, 2020, Plaintiff submitted a revised 30(b)(6) Notice containing ten categories. Plaintiff is adding two topics to such notice as of July 1, 2020. As of this writing, the Parties have not yet had an opportunity to address those categories but are scheduled to do so on July 6, 2020. The Parties' respective positions on them are:

Plaintiff's Position

Plaintiff believes that the Rule 30(b)(6) Notice is sufficiently specific and not overbroad; however, Plaintiff will work with Defendants to attempt to allay any such concerns at the upcoming meet and confer on July 6, 2020.

The Village's Position

The Village's position is that one of the categories should have been resolved pursuant to the Village's Responses Regarding Plaintiff's Deposition Exhibit List, two of the topics are acceptable and the Village will designate witness(es), and the Village believes that the remainder are either overbroad, or the Village needs clarification as to what is being sought.

3. Whether the Parties are Interested in Scheduling a Settlement Conference.

At this point, the Parties do not unanimously agree that a settlement conference would be productive and therefore do not request a settlement conference.

Dated: July 1, 2020

Respectfully submitted,

/s/ Cass T. Casper
/s/ Gianna Scatchell

/s/ Jeffrey S. Fowler
/s/ K. Austin Zimmer

/s/ Michael Bersani

For Plaintiff:

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CERTIFICATE OF SERVICE

I, Cass T. Casper, an attorney, hereby certify that on July 1, 2020, I caused to be served a copy of the foregoing Joint Status Report in the above-captioned matter to be filed with the Clerk of the District Court and served on the parties of record, including those listed below, by operation of the Court's CM/ECF electronic filing system, addressed to:

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/s/Cass T. Casper
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